



300 Cadman Plaza W, 12 FL
Brooklyn, NY 11201
Fax: 646-679-2527

718-344-6048
caner@canerlawoffice.com

GRANTED. The Initial Case Management Conference is adjourned to September 14, 2023 at 10:30am. SO ORDERED.

Hon. Jennifer E. Willis
United States Magistrate Judge
United States District Court
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

A handwritten signature in black ink that reads "Jennifer E. Willis".

Jennifer E. Willis
United States Magistrate Judge

August 21, 2023

Re: File: 00397-Chabrier (1412002446)
Christopher Chabrier v Correctional Officer Martinez, et al
Case Number: 22-cv-06239-GHW-JW

Dear Magistrate Judge Willis:

I represent the plaintiff, Christopher Chabrier. I write to request an adjournment of the Initial Conference scheduled for August 29, 2023. This is the first request to adjourn the Initial Conference and it will not affect any other current deadlines in this case. The reason for this request is the undersigned will be actively engaged in the deposition of plaintiff in *Pete Dettori v. Government Employees Insurance Company*, 22-cv-06442-NGG-LGD (E.D.N.Y.) on August 29, 2023. The deposition cannot be adjourned as the plaintiff will start a new job the following week, making it impossible to abide by the court's discovery schedule in *Dettori* thereafter.

Additionally, I was recently retained and am still reviewing the files and awaiting receipt of more documents from my client and from medical release requests. It is expected that an Amended Complaint will be filed with possible consent by defendant or upon potential leave granted by motion to the Court.

I have spoken with counsel for defendants who consents to the requested adjournment. Defense counsel and I are available to conduct the initial conference on September 12, 14, and 25 or other date to be set by the Court. I am specifically not available on September 20, 2023 as I will be actively engaged in oral argument before the U.S. Court of Appeals for the Second Circuit in *Antonio Mallet v. New York State Department of Corrections and Community Supervision, et al.*, 22-2884 (2d Cir. 2023).

On another note, I have been unable to access or download certain documents on the ECF docket in this matter, i.e., the *pro se* Complaint. I request that the Clerk's office be directed to permit the undersigned's PACER account permission to access all documents on the ECF docket or that instructions be provided for the undersigned to take the steps necessary to access such documents.



Thank you for your time and attention to this matter.

Very truly yours,



Caner Demirayak, Esq.

CC: Defense counsel via ECF